

Private Practice Physical/ Occupational Therapy Billing

4/2/2025

Closed Captioning: *Auto-generated closed captioning is enabled in this course and is at best 70-90% accurate. Words prone to error include specialized terminology, proper names and acronyms.*

Today's Presenters

Arlene Dunphy,
CPC



Provider Outreach and
Education Consultant

Michelle
Coleman, CPC



Provider Outreach and
Education Consultant



Disclaimer

National Government Services, Inc. has produced this material as an informational reference for providers furnishing services in our contract jurisdiction. National Government Services employees, agents, and staff make no representation, warranty, or guarantee that this compilation of Medicare information is error-free and will bear no responsibility or liability for the results or consequences of the use of this material. Although every reasonable effort has been made to assure the accuracy of the information within these pages at the time of publication, the Medicare Program is constantly changing, and it is the responsibility of each provider to remain abreast of the Medicare Program requirements. Any regulations, policies and/or guidelines cited in this publication are subject to change without further notice. Current Medicare regulations can be found on the [CMS website](#).



Recording

Attendees/providers are never permitted to record (tape record or any other method) our educational events. This applies to webinars, teleconferences, live events and any other type of National Government Services educational events.

Objective

Review Medicare billing and coverage guidelines that apply to physical/occupational therapy services.

Provide appropriate resources and tools in order to find additional information for your practice.



Agenda

- [Medical Necessity](#)
- [Plan of Care](#)
- [Certifications/Recertifications](#)
- [Skilled Therapy](#)
- [Caregiver Training Services](#)
- [Initial Evaluation/ Reevaluations](#)
- [Modalities](#)
- [Progress Reports](#)
- [Treatment Notes](#)
- [Discharge Notes](#)
- [Maintenance Care](#)
- [Documentation Requirements](#)
- [Remote Therapeutic Monitoring](#)
- [Service Provided In Whole or In Part by PTA/OTA](#)
- [KX Threshold](#)
- [Medical Review Additional Development Request](#)
- [Documentation](#)
- [Resources](#)

Medical Necessity

Medical Necessity

- Rehabilitative Therapy
 - Condition has the potential to improve or is improving from therapy
 - Maximum improvement is yet to be attained
 - Expectation that improvement is attainable in a reasonable and generally predictable period of time
 - Services must be skilled in nature

Physician Order/RX

- CMS IOM states: “No Medicare requirement for an order/RX”
- Payment is dependent on certification of the POC rather than physician order/RX
- State laws may require physician order/RX

Plan of Care

Plan of Care – Goals

- Improve functioning
 - Must require the skills of a therapist
- Maintain, prevent or slow further deterioration
 - Must require the skills of a therapist

Plan of Care

- Developed by the physician/NPP or PT/OT who will provide the PT/OT services
 - Must be certified by a physician/NPP
- Signature/credentials of the therapist or physician/NPP must be present and dated
- Each therapy discipline must have a separate plan of care

Two Plans

- May treat under two separate POCs when different physicians/NPPs refer a patient for different conditions
 - May combine the POCs into one covering both conditions
 - Only if one of the referring physician/NPP is willing to certify the POC for both conditions
- PTs may not provide services under an OT POC (vice versa)
 - Both may treat a patient for the same conditions at different times of the day
 - Goals must be consistent with their own scope of practice

Required POC Elements

Required POC Elements	Additional Points
Diagnosis	Diagnosis should be specific and relevant to the problem
Long Term Goals	<ul style="list-style-type: none">• Pertain to the functional impairment findings documented in the evaluation• Reflect the final level the patient is expected to achieve• Be realistic, and should have a positive effect on the quality of the patient's everyday functions• Be function-based and written in objective, measurable terms with a predicted date for achieving the goals

Required POC Elements

Required POC Elements	Additional Points
Type of Treatment	Therapy discipline operating under this POC (PT or OT) and should describe the types of treatment modalities, procedures or interventions to be provided
Amount of Treatment	Number of times in a day the type of treatment will be provided
Frequency of Treatment	Number of times in a week that the type of treatment is provided
Duration of Treatment	Number of weeks, or the number of treatment sessions, for this plan of care

Changes to the Therapy Plan

- Changes made in writing in patient's record and signed by professional responsible for patient's care
- Physician/NPP may change a plan of treatment established by the therapist
- Therapist may not alter plan of treatment established/certified by physician/NPP without their documented written/verbal approval

Plan of Care Modifiers

- GO
 - Services delivered under an outpatient occupational therapy plan of care
- GP
 - Services delivered under an outpatient physical therapy plan of care

POC Errors

- Missing physician's or NPP's dated signature certifying the POC
- Missing signature of the physician's, NPP's or therapist who developed and established the treatment plan and date of establishment
- Missing significant POC changes
- Missing modifiers
- Missing POC certifying provider's name and NPI on the claim

Certifications/Recertifications

Certifications/Recertifications

- Requires dated signature on POC or some other document that indicates approval of plan of care
- Acceptable forms of certification determined by practitioner
 - Physician's progress notes
 - Physician/NPP order
 - Plan of care signed/dated by physician/NPP and indicates they are aware therapy is in progress and does not disagree with plan

Certifications/Recertifications

- Certifications
 - Physician/NPP certifies the initial POC with a dated signature or verbal order within 30 days of the first day of treatment
 - Verbal orders must be signed and dated within 14 days
 - Delayed certification must include a reason for the delay
 - Physician did not sign
 - Original was lost
 - Certifications without justification will be acceptable up to 30 days after the due date
- Recertifications
 - Timely when dated during the duration of the initial plan or
 - Within 90 calendar days of the initial treatment

Certifications/Recertifications

- Interval length shall be determined by the patient's needs, not to exceed 90 days
- Certifications will be valid for the longest duration in the plan
 - Example: three times a week for six weeks, total 18 treatments
- Treatment continued past the longest duration specified will require recertification

Certifications Exception – Effective 1/1/2025

- An exception will be provided to the physician/NPP signature requirement on a therapist established treatment plan for the purpose of the **initial certification**
 - A written order/referral from the physician/NPP must be on file and
 - A therapist has documented evidence that the treatment plan was transmitted to the physician/NPP within 30 days of the initial evaluation
- For cases meeting the exception to the signature requirement policy
 - Payment should be made available for any therapy services furnished prior to a physician/NPP modified treatment plan

Skilled Therapy

Skilled Therapy

- Services that require professional skills of a therapist to perform or supervise
- Patient's therapy that can proceed safely and effectively through a home program are not skilled services
 - Exercise
 - Self-management
 - Restorative nursing
 - Caregiver assisted

Caregiver Training Services

Caregiver Training Services

- Practitioners who train and involve caregivers to support patients with certain diseases or illnesses (e.g., dementia) in carrying out a treatment plan or therapy plan of care
- When services are provided by PTs, OTs and SLPs these services are **always furnished under therapy plans of care**
 - Appropriate therapy modifier (GP, GO or GN) is required to reflect they are provided under a PT, OT, SLP POC
- Services will be paid to a
 - Physician
 - Nonphysician practitioner (NP, CNS, PA, CP) or therapist (PT, OT, SLP)

Individual-Group Codes

Individual Codes	Description	Caregivers
97550	Caregiver training in strategies and techniques to facilitate the patient's functional performance in the home or community (e.g., activities of daily living [ADLs], instrumental ADLs [IADLs], transfers, mobility, communication, swallowing, feeding, problem solving, safety practices) (without the patient present), face-to-face; initial 30 minutes	One or more caregiver for a single patient
97551	each additional 15 minutes	One or more caregiver for a single patient
97552 (group code)	Group caregiver training in strategies and techniques to facilitate the patient's functional performance in the home or community (eg, activities of daily living [ADLs], instrumental ADLs [iADLs], transfers, mobility, communication, swallowing, feeding, problem solving, safety practices) (without the patient present), face to face with multiple sets of caregivers. (Different patients)	Multiple groups of caregivers (different patients)

Caregiver Training Services

- CTS need to be congruent with the treatment plan/therapy plan of care
- May be paid for one or more caregivers
- Document the need and patient's consent was given
 - Obtain consent early in cases of Alzheimer's, dementia, etc.
- Patient should not be present
 - Focus should be on training the caregiver
- Volume and frequency for the same patient may be based on the treatment plan, changes in the patient's condition, the diagnosis or the caregivers
- **Now available through telehealth**

Personnel Authorized/Not Authorized to Provide Outpatient Therapy Service

Personnel Authorized to Provide Outpatient Therapy Service

- Physician
- Nonphysician practitioner
- Qualified PT/OT, SLP, assistants working under the supervision of a qualified therapist
- Qualified personnel, with or without a license to practice therapy
 - Must be educated and trained as a therapist and
 - Qualified to furnish therapy services under direct supervision incident to a physician/NPP

Personnel Not Authorized to Provide Outpatient Therapy Service

- Students
- Aides
- Athletic trainers
- Exercise physiologists
- Massage therapists
- Recreation therapists
- Kinesiotherapists
- Low vision specialists
- Pilates instructors
- Rehab technicians
- Life skills trainers

Therapy Students

- Services of therapy students are not covered under Medicare even under line-of-sight supervision by a therapist
- However, services of a qualified professional are covered, even when student is participating in care
 - Must direct the service
 - Not be engaged in treating another patient
 - Must sign all documentation

Incident to Services

- Services may be provided by a therapist incident to the services of a physician/NPP
 - Therapist does not need a license to practice therapy
 - State law may require
 - All other PT/OT qualifications must be met
 - Must be directly supervised
 - The physician must be immediately available to furnish assistance and direction throughout the performance of the procedure
 - Physician does not need to be present in the room when the procedure is performed

Supervision Policy for Physical Therapists and Occupational Therapists in Private Practice

- PTs and OTs in private practice will be allowed to provide general supervision to PTAs and OTAs for all applicable PT/OT therapy services
 - Aligning with general supervision guidelines for institutional providers
 - General supervision definition - *procedure or service furnished under the physician's overall direction and control, but the physician's presence is not required during the performance of the procedure*
- Therapy services provided in States with more restrictive supervision levels (direct supervision) must comply with State law
- OTPP or PTPP will still be required to provide direct supervision to unenrolled OTs and PTs

Initial Evaluation/Reevaluations

Initial Evaluation

- Initial evaluation should document necessity of therapy through objective findings and subjective patient/caregiver self-reporting
- If over the course of an episode of treatment a new unrelated diagnosis occurs another initial evaluation may be covered
- Initial evaluations may be performed for other therapy disciplines
 - Evaluation and POC must not be duplicative

Reevaluations

- Progress toward current goals, making a judgment about continued care, modifying goals or/treatment or terminating services
 - New clinical findings
 - Significant change in patient's condition
 - Failure to respond
- Inappropriate Billing of Reevaluations
 - Is not a routine, recurring service
 - Should not be billed routinely at every tenth visit with the completion of a progress note
 - Should not be billed when a recertification is performed when there are no changes to the POC or when a recertification is required (e.g., every 90 days)

Modalities

General Modality Guidelines

- Modalities selected based on the most effective means of achieving the patient's functional goals
- Seldom should a patient require more than one or two modalities to the same body part
 - Use of more than two modalities on each date is unusual and requires documentation
- Multiple heating modalities should not be used on the same day
- Documentation must support the use of multiple modalities as contributing to the patient's progress and restoration of function
- LCD and billing and coding article list the guidelines for each specific code
- Based on the CPT descriptors, these modalities apply to one or more areas treated
- Documentation requirements outlined

Modality Example

- CPT 97034 – Contrast Baths (to one or more areas)
 - Contrast baths are a form of therapeutic heat and cold applied to distal extremities in an alternating pattern
 - The effectiveness of contrast baths is thought to be due to reflex hyperemia produced by the alternating exposure to heat and cold
 - Not covered when the services provided are hot and cold packs
 - Should be used in conjunction with therapeutic procedures, not as an isolated treatment
 - Constant attendance code requiring direct, one-on-one patient contact by the provider
 - Only the actual time of the provider’s direct contact with the patient is to be billed
- Supportive Documentation Requirements (required at least every ten visits)
 - Rationale requiring the unique skills of a therapist to apply, including the complicating factors
 - Area(s) being treated
 - Subjective findings to include pain ratings, pain location, effect on function
 - Documentation must indicate the presence of these complicating factors for reimbursement
 - If there are no complicating factors requiring the skills of a therapist, this modality is noncovered

Therapeutic Guidelines

Therapeutic Guidelines

- Attempt to reduce impairments/restore function through the application of clinical skills and/or services
- Use of these procedures is expected to result in improvement in a reasonable and generally predictable period of time

General Guidelines for Therapeutic Procedures

- Codes will define if direct one-on-one contact is required
- Only the actual time of direct contact will be considered
- Expected goals of the treatment plan need to be documented
- Any one or a combination of these procedures may be used

Progress Reports

Progress Reports

- Provides justification for the medical necessity of treatment
- Written by the clinician at least once every ten treatment days
- Required Elements
 - Date of the beginning and end of the reporting period that this report refers to
 - Date that the report was written by the clinician, or if dictated, the date on which it was dictated
 - Objective reports of the patient's subjective statements, if they are relevant
 - Objective measurements (impairment/function testing) to justify continued treatment

Progress Reports

- Required Elements
 - Changes in status relative to each goal currently being addressed in treatment
 - Make identifiable reference to the goals in the current plan of care
 - Assessment of improvement, extent of progress (or lack thereof) toward each goal
 - Plans for continuing treatment, including documentation of treatment plan revisions as appropriate
 - Long or short-term goals, discharge or an updated plan of care
 - Signature with credentials of the clinician who wrote the report (CMS requires clinician must write the report)
 - *State regulations may vary*

Treatment Notes

Treatment Notes

- Required for every treatment day and therapy service
- Required Elements
 - Date of treatment
 - Identify each specific treatment, intervention or activity provided
 - Record the total time spent (represented by timed codes and untimed code treatment minutes)
 - Record of total treatment in minutes (sums the timed codes and untimed code treatment minutes)
 - Signature and credentials
 - Include on grid or checklist used for daily notes/activity log

Treatment Notes

- Exercise names alone do not imply that the services were skilled in nature
- Functional activities should be documented including the skilled techniques used
- Time for each specific intervention/modality may be recorded

Unbillable Charges

- Changing
- Waiting for treatment to begin
- Waiting for equipment
- Resting
- Toileting
- Performing unskilled or independent exercises or activities

Discharge Notes

Discharge Notes

- Required for each episode of treatment
- Written by the clinician
- Covers from the last progress report up to the date of discharge
- Includes all components of a progress report

The background is a solid dark blue color with several overlapping, semi-transparent geometric shapes in lighter shades of blue. These shapes include triangles, rectangles, and rounded forms, creating a layered, abstract pattern. The text 'Maintenance Care' is centered horizontally and vertically in a white, sans-serif font.

Maintenance Care

Maintenance Program

- Established when the skills of a therapist are required to safely and effectively furnish to maintain, prevent or slow further deterioration of the patient's functional status
- Once a maintenance program is established, coverage of therapy services to carry out a maintenance program turns on the beneficiary's need for skilled care
 - Can generally be performed by the beneficiary alone or with the assistance of a family member, caregiver or unskilled personnel
 - Skilled therapy services are covered when an individualized assessment of the patient's clinical condition demonstrates that the specialized judgment, knowledge, and skills of a qualified therapist are necessary for the performance of safe and effective services in a maintenance program

Maintenance Program

- While a beneficiary's particular medical condition is a valid factor in deciding if skilled (rehabilitative or maintenance) therapy services are needed, a beneficiary's diagnosis or prognosis should never be the sole factor in deciding that a service is or is not skilled
 - The key points is whether the skills of a qualified therapist are needed, or whether the service(s) can be carried out by nonskilled personnel

Other Available Therapy Services

- Muscle and range of motion testing
- Application of casts, strapping and splinting codes
- General guidelines for casting
- General guidelines for strapping
- Special instructions for strapping; Unna boot
- General guidelines for splinting
- Biofeedback training by any modality
- Canalith repositioning procedure(s) (e.g., Epley maneuver, Semont maneuver), per day
- Standardized cognitive performance testing (e.g., Ross Information Processing Assessment) per hour of a qualified health care professional's time, both face-to-face time administering tests to the patient and time interpreting these test results and preparing the report

Miscellaneous Services (Noncovered)

- Anodyne
- Low level laser treatment (LLLT)/cold laser therapy
- Dry hydrotherapy massage (e.g., aqua massage, hydromassage or water massage)
- Massage chairs or roller beds
- Interactive metronome therapy
- Loop reflex training
- Vestibular ocular reflex training
- Continuous passive motion device setup and adjustments
- Craniosacral therapy
- Electro-magnetic therapy, except as indicated for chronic wounds
- Constraint Induced Movement Therapy Work-hardening programs

*Not an all-inclusive listing, see LCD L33631

Documentation Requirements

Documentation Requirements

- Include
 - Medical history, physical exam, results of diagnostic test and procedures, time of any assessment
 - Must be legible, relevant and sufficient to justify the medical necessity
- Reminder
 - POC, initial evaluation, certification/recertification should also be included in the record

Documentation Requirements

- Legible identifier of the person who provided the service
 - Handwritten or electronic signature to sign an order or other medical documentation for medical review purpose
 - Electronic or handwritten signatures that have been communicated through facsimile are also acceptable
- Medical review decisions are based on the information submitted in the medical record
- Critical that your medical record information submitted is accurate and complete to allow medical review to make a fair decision

Documentation Requirements

- Paint a picture of the patient's impairments and functional limitations requiring skilled intervention
 - Describe prior functional level to assist in establishing the patient's potential and prognosis
 - Describe the skilled nature of the therapy treatment provided
 - Justify the type, frequency and duration of therapy
 - Clearly document both timed code treatment minutes and total treatment time
- Do not use the same statement on all EHR entries and change the patient's name

Utilization Guidelines

Utilization Guidelines

- Untimed Codes
 - Not defined in CPT by a specific time frame
 - Document as “Total Treatment Time”
 - Often provided once per day
 - Significant documentation is required when performed more often
- Timed Codes
 - Count time the patient is treated using skilled therapy
 - Document as “Timed Code Treatment Minutes”

Timed/Untimed Physical Therapy Billing Codes

Timed Codes

- Many CPT codes used for therapy modalities; procedures specify that direct (one-on-one) time spent with the patient is 15 minutes
- Services provided for a single timed CPT code that is less than eight minutes should not be billed however, if multiple procedures are performed at the same session the minutes can count towards total treatment time

Eight Minute Rule Reference Chart

Minutes	Units
8–22 minutes	One unit
23–37 minutes	Two units
38–52 minutes	Three units
53–67 minutes	Four units
68–82 minutes	Five units
83 minutes	Six units

Timed Code Example One

- CPT codes 97110 and 97140
 - 20 minutes of 97110
 - 20 minutes of 97140

Add all minutes = 40 minutes of total timed codes
- Three billable units
 - Two units for code 97110, one unit for code 97140
 - Provider selects how they are split

Timed Code Example Two

- CPT Codes 97035 and 97110
 - Five minutes of 97035
 - Seven minutes of 97110

Add all minutes = 12 minutes of total timed codes
- One billable unit

Timed Code Example Three

- CPT codes 97110 and 97140

- Seven minutes of 97110
- 18 minutes of 97140

Add all minutes = 25 minutes of total timed codes

- Two billable units
 - One unit of 97110
 - One unit of 97140

Untimed Codes

- Do not have a time requirement
 - Typically provided to a patient only once per day
- Only one unit of these codes are billed regardless of how long they are performed to the patient
 - These codes are billed as one unit but are not included in the totaling of the timed code units
 - Reevaluation codes are untimed, billable as one unit

Miscoded Services

- Do not bill for
 - Documentation time
 - Codes higher than what was performed
 - Codes based on reimbursement amount
 - Supplies separately
- Therapist working as a team cannot each bill for the same or different service provided at the same time

Remote Therapeutic Monitoring

Use of RPM or RTM in Conjunction With Other Services

- CPT code 98980 (RTM treatment management) cannot be reported in conjunction with CPT codes 99457/99458 (RPM treatment management)
- RPM or RTM services are prohibited to be furnished during the global period by the billing practitioner who is receiving the global payment
 - Practitioners, such as therapists, who are not receiving a global service payment, would be permitted to furnish RPM or RTM services during a global period
- [2025 Annual Update to the Therapy Code List: Remote Therapeutic Monitoring](#)

Service Provided In Whole or In Part
by PTA/OTA

Service Provided In Whole or In Part by PTA/OTA

- Effective 1/1/2022
- Identify and make payment at 85% for services furnished in whole or part by PTAs/OTAs
- Allowed at 85% of the MPFSDB
- Modifiers
 - CQ – Outpatient physical therapy services furnished in whole or in part by a physical therapist assistant
 - CO – Outpatient occupational therapy services furnished in whole or in part by an occupational therapy assistant
 - Use in conjunction with one of the existing therapy modifiers (GP, GO)

Service Provided In Whole or In Part by PTA/OTA

- Claims must include modifier CQ or CO when
 - PTA/OTA furnishes all the minutes of a service independent of the PT/OT
 - PTA/OTA furnishes a portion of a service separately from the part that is furnished by the PT/OT
 - PTA/OTA portion exceeds ten percent of the total minutes for that service
 - Ten percent is the de minimis standard
 - Use the simple method or the percentage method to calculate the de minimis standard

Service Provided In Whole or In Part by PTA/OTA

- In cases where a PT/OT and PTA/OTA provide care independent from one another, but the PT/OT meets the 15-minute requirement, CMS will not apply the de minimis standard
 - Would be billed without a CQ/CO modifier
 - In this case any minutes furnished by the PTA/OTA would not apply for billing purposes

De minimis Example One

- PT or OT renders 24 mins of CPT 97110
- PTA or OTA renders ten mins of CPT 97110
 - Add up the total treatment time: 34 mins
 - Two billable units can be billed in total under the PT/OT without counting the assistance minutes since the eight min rule was met by the 24 mins of 97110

De minimis Example Two

- PT/OT provides 20 min of 97140/ 12 min of 97110
- PTA/OTA provides 14 min of 97110
 - Add up the total treatment time: 46 min (three billable units)
 - One unit is billed under the PT/OT for 97140
 - One unit is billed under the PT/OT for 97110
 - One unit is billed under the PTA/OTA for 97110 with a modifier of CO or CQ

KX Threshold

KX Modifier

- CY 2025 KX modifier threshold amounts
 - \$2,410 for PT and SLP services combined/\$2,410 for OT services
- 2025 Medical record threshold amount
 - PT/SLP \$3,000/OT \$3,000
 - Will remain \$3,000 until CY 2028

KX Modifier

- Documentation must support and justify that the beneficiary qualifies for the therapy cap exception, that services are reasonable and necessary, as well as require the skills of a therapist
- The presence of the KX modifier demonstrates that services billed
 - Qualify for the annual threshold
 - Are reasonable and necessary services that require the skills of a therapist
 - Are justified by appropriate documentation in the medical record
- Therapy services submitted without the KX modifier for claims above the therapy threshold will deny

KX Modifier

- For medically necessary services use the GO, or GP therapy modifier, in addition to the KX modifier
 - KX modifier should not be added to any line of service that is not a medically necessary service
- Codes subject to the therapy threshold posted annual
 - [Annual Therapy Update](#)

Modifier Appeals

- Adding/changing a modifier
 - Excluding modifiers AQ, AR, QU, QB, 22, 23, 52, 53, 62, 66, GA, GY and GZ
 - KX modifier can be initiated through a reopening in NGSConnex or on a Reopening Request Form
 - [Reopenings for Minor Errors and Omissions](#)

NGSConnex Therapy Information

- Therapy services used dollar amount applied to the capitation limit associated with the calendar year indicated

Therapy		
Year 1	Occupational Therapy Amt - Year 1	Physical Therapy Amt - Year 1
2021	\$0.00	\$0.00
Year 2	Occupational Therapy Amt - Year 2	Physical Therapy Amt - Year 2
2020	\$0.00	\$0.00
Year 3	Occupational Therapy Amt - Year 3	Physical Therapy Amt - Year 3
2019	\$0.00	\$0.00
Year 4	Occupational Therapy Amt - Year 4	Physical Therapy Amt - Year 4
2018	\$0.00	\$0.00
Year 5	Occupational Therapy Amt - Year 5	Physical Therapy Amt - Year 5
2017	\$0.00	\$0.00



Medical Review Additional Development Request Documentation

Medical Review Therapy Documentation Checklist for ADR Letters

- Refer to the checklist below when preparing your documentation in response to an ADR
 - Doctor's orders
 - Certifications/Recertifications
 - Initial evaluations
 - Any reevaluations and documentation of medical necessity for reevaluations
 - Any pertinent diagnostic testing and results

Medical Review Therapy Documentation Checklist for ADR Letters

- Therapists' notes for dates of service
- Logs/treatment records/encounter sheets indicating date, time, type and duration to support units billed
- Plans of treatment, goals and progress towards goals
- Progress notes since onset of therapy

Medical Review Therapy Documentation Checklist for ADR Letters

- Any abbreviation keys or acronym keys used
- Copies of any patient notices given (e.g., ABN)
- Documentation to support level of supervision requirements met if applicable
- Documentation to support any other services billed in conjunction with therapy services
- Documentation of practitioner's credentials

Documentation Issues-Medical Review

- NGS is seeing a high volume of claims documentation where the therapist is not capturing their activities in the medical records
- Vague/generalized documentation that does not capture the **skills** of a therapist does not support medical necessity requirements
- EMR systems are helpful; however, overutilization may create notes that don't show skilled therapy
 - EMR may create generalized statements such as “Continue PT” “Patient is progressing” “Patient is participating”
 - Find a balance between doing such minimal documentation that it does not read skilled vs over documenting that causes provider burden

“What if” and Scenario Questions

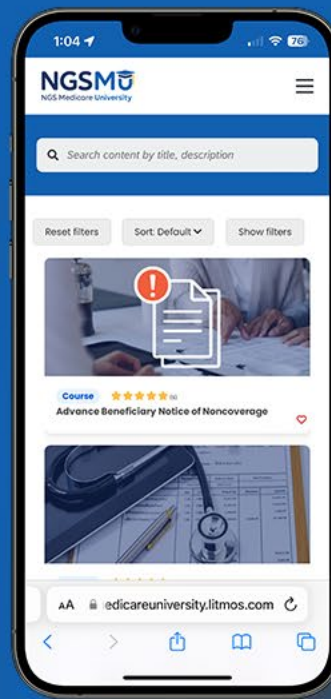
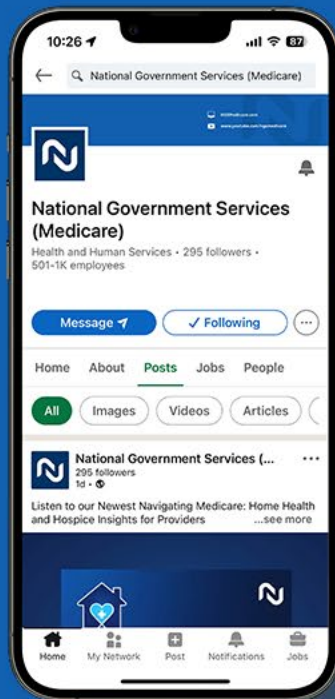
- MACs cannot provide a definitive answer on whether Medicare would make payment for a service
 - MACs can only provide information on Medicare rules and regulations, the final determination is based on information contained in an individual patient’s medical record
- MACs may not provide a preliminary medical review determination based on snippets of information or documentation
 - Final determination of payment is made after the submission of the claim and any medical review that may be performed
 - MACs will not grant prior approval or affirm a provider’s individual practice’s procedures, coding or documentation are sufficient to meet all Medicare guidelines
- Remember, providers are responsible for determining the correct diagnostic and procedural coding for the services furnished to Medicare patients
- After reviewing Medicare guidelines, providers, compliance, audit and/or billing staff can find more information on coding resources in [CMS IOM Publication 100-09, Medicare Administrative Contractor \(MAC\) Beneficiary and Provider Communications Manual, Chapter 6, Section 30.3.1](#)

Resources

Resources

- [Therapy Code List](#)
- [2024 Annual Update to the Therapy Code List: Remote Therapeutic Monitoring](#)
- [2024 Annual Update to the Therapy Code List: Caregiver Training Codes](#)
- [CMS Therapy Services webpage](#)
- [CMS IOM Publication 100-02, Medicare Benefit Policy Manual, Chapter 12](#)
- [CMS IOM Publication 100-02, Medicare Benefit Policy Manual, Chapter 15](#)
- [CMS IOM Publication 100-04, Medicare Claims Processing Manual, Chapter 5](#)





Connect with us on social media



[YouTube Channel](#)
Educational Videos

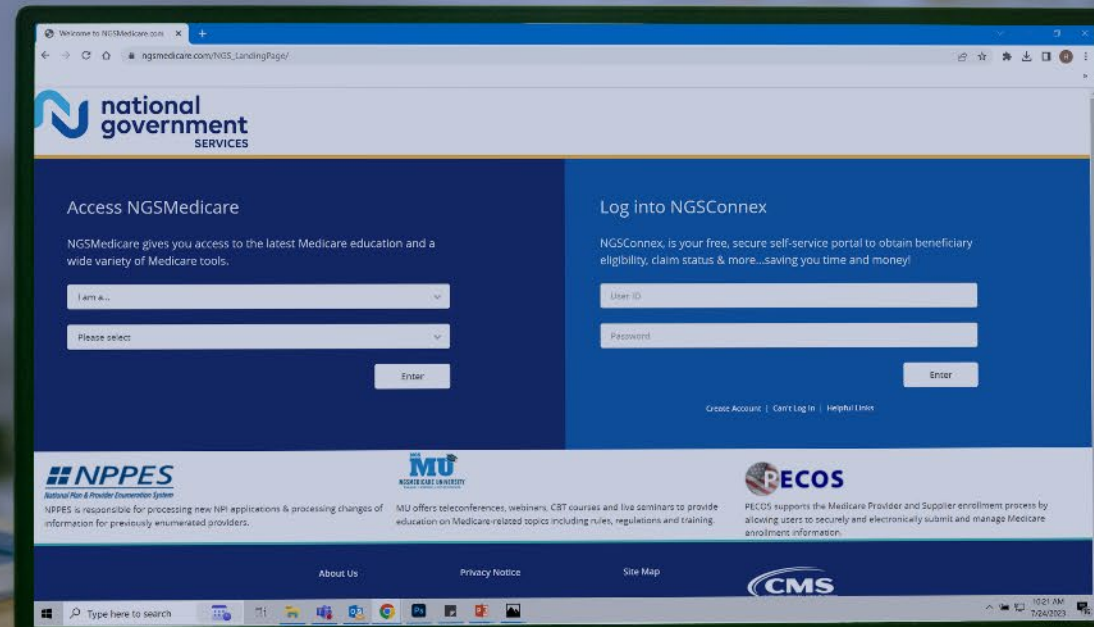


[Medicare University](#)
Self-paced online learning



[LinkedIn](#)
Educational Content

Find us online



www.NGS Medicare.com

Online resources, event calendar, LCD/NCD, and tools



[IVR System](#)

The interactive voice response system (IVR) is available 24-hours a day, seven days a week to answer general inquiries



[NGSConnex](#)

Web portal for claim information



[Sign up for Email Updates](#)

Subscribe for Email updates at the top of any NGS Medicare.com webpage to stay informed of news



Questions?

Thank you!